

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC and  
the Chapter 7 Estate of Bernard L. Madoff,

Plaintiff,

v.

UBS EUROPE SE (f/k/a UBS (LUXEMBOURG)  
S.A.), UBS FUND SERVICES (LUXEMBOURG)  
S.A., UBS THIRD PARTY MANAGEMENT  
COMPANY S.A., M&B CAPITAL ADVISERS  
SOCIEDAD DE VALORES, S.A., RELIANCE  
INTERNATIONAL RESEARCH LLC,  
LUXEMBOURG INVESTMENT FUND AND  
LUXEMBOURG INVESTMENT FUND U.S.  
EQUITY PLUS, as represented by their Liquidators  
MAÎTRE ALAIN RUKAVINA and PAUL  
LAPLUME, MAÎTRE ALAIN RUKAVINA and  
PAUL LAPLUME, in their capacities as liquidators  
and representatives of LUXEMBOURG  
INVESTMENT FUND AND LUXEMBOURG  
INVESTMENT FUND U.S. EQUITY PLUS,

Defendants.

Adv. Proc. No. 10-05311 (CGM)

**DECLARATION OF MARK J. HYLAND IN SUPPORT OF  
RELIANCE INTERNATIONAL RESEARCH LLC'S MOTION TO DISMISS THE  
SECOND AMENDED COMPLAINT**

I, Mark J. Hyland, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am senior counsel with the law firm of Seward & Kissel LLP, counsel for Defendant Reliance International Research LLC (“RIR”) in the above-captioned action and submit this declaration in support of RIR’s Motion to Dismiss the Second Amended Complaint filed on February 24, 2023, by Plaintiff Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC and the chapter 7 Estate of Bernard L. Madoff (the “Trustee”).

2. Attached hereto as **Exhibit 1** is a true and correct copy of the Research Services Agreement by and between RIR and Reliance Management (Gibraltar) Limited (“RMGL”), dated May 24, 2005.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the Research and Administrative Services Agreement by and between RIR, RMGL, and Reliance Management (BVI) Limited, dated September 15, 2008.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 5, 2023.

/s/ Mark J. Hyland

Mark J. Hyland